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September 9, 2021

VIA ECF

Hon. Louis L. Stanton
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Dresser-Rand Company v. Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A.*
S.D.N.Y. Docket No. 1:19-cv-002689-LLS

Dear Judge Stanton:

We represent defendants Petróleos de Venezuela, S.A. ("PDVSA") and PDVSA Petróleo, S.A. ("Petróleo") (together, "Defendants") in the above-referenced action. We write to request permission from the Court to conduct an examination of a non-party witness by videoconference at the upcoming trial set to begin in this matter on September 21, 2021.

PDVSA has issued a subpoena to non-party Angela Brogan of Deutsche Bank to appear and testify at the hearing in this matter. Outside counsel for Deutsche Bank has advised that Ms. Brogan is the sole caregiver of her 100 year old father, and for that reason, does not feel comfortable attending the trial in person in light of the COVID-19 pandemic. Counsel for Deutsche Bank has advised, however, that Ms. Brogan would be willing to appear and testify at trial by videoconference. With the Court's permission, PDVSA would like to accommodate Ms. Brogan's request, and can work with the Court's audio/visual department to make the necessary arrangements. We have conferred with counsel for plaintiff Dresser-Rand Company and they have advised that they do not object to this request.

For these reasons, we respectfully request that the Court allows PDVSA to introduce the live testimony of Ms. Brogan by videoconference at trial.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Ducharme', written over a horizontal line.

Matthew A. Ducharme